

SECTION 9

Medi-Cal Administrative Activities (MAA) Documentation

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RECORD KEEPING AND RETENTION

Overview

The heart of Medi-Cal Administrative Activities (MAA) claiming is the time survey. Federal regulations require that records be kept for three years after the end of the quarter in which the expenditures were incurred. If an audit is in progress, all records relevant to the audit must be retained until the completion of the audit or the final resolution of all audit exceptions, deferral's and/or disallowances. All records retained must be in readily reviewable form, in an audit file by program and be available to the state and federal government upon request in accordance with record retention requirements set forth under the 42 Code of Federal Regulations (CFR) Section 433.32. This documentation includes all **original** time survey documentation. The time survey documentation must be kept in a central location and easily accessible.

Similarly, the documents that support the construction of a MAA claim need to be kept three years after the last claim revision. These documents include the documentation that supports the Medi-Cal percentage, the basis of the cost pools, documentation of Skilled Professional Medical Personnel (SPMP) status, and position descriptions and/or duty statements for all staff performing MAA.

Building and Maintaining an Audit File

Each Local Educational Consortium (LEC) must develop an audit file beginning the first quarter in which a time survey is conducted. A checklist has been developed to assist the LEC in this task. Documentation is necessary to respond to audit inquiries and is also essential when staff who were responsible for the time survey or the MAA claim leave the organization, and when new staff must take on this responsibility.

MEDI-CAL ADMINISTRATION ACTIVITIES DOCUMENTATION

MEDI-CAL ADMINISTRATIVE ACTIVITIES (MAA) AUDIT GUIDELINES

The following guidelines are provided to assist in development of an audit documentation file. Adherence to these guidelines will minimize the risk of audit disallowances. Documentation unique to each quarterly claim should be kept in a separate file. In some cases, required documentation for each quarterly claim will be identical, i.e., organization charts, position descriptions, duty statements etc. In other cases, materials will be too voluminous to keep in the file, e.g., time cards. In both of these cases documentation should be kept in the audit file detailing where the materials can be found. It may also be helpful if you maintain, and refer to, a general MAA file for documentation used from quarter to quarter. All materials referenced **must** be available for review throughout the record retention period.

Records to be retained by the Local Educational Consortium (LEC) for each MAA claiming unit include but are not limited to:

Time Survey Materials

A listing of employees participating in each time survey must be maintained in the audit file. Include name, position classification, and SPMP status, if applicable.

The original time survey used during the month of the time survey must be included in the file to support the MAA claim, signed by the worker and supervisor. The time survey must be completed throughout the course of the day, not at the end of the day or end of the week to assure accuracy. Time survey documents should be clean and legible, and completed by the staff person for whom time is being recorded utilizing his or her best judgment based on the description of activities relative to the MAA activities.

Supervisors are **not** to make any corrections or alterations to the time surveys. When making corrections to time surveys, staff should not use white out; use a single strikeout and initial instead. Time surveys are legal documents which serve as the basis for MAA claiming.

Copies of time cards for the time survey period, **or** documentation where they can be found, must be available during the record retention period.

MEDI-CAL ADMINISTRATION ACTIVITIES DOCUMENTATION

MAA Claiming Plan and Amendments

The MAA Claiming Plan approved by DHS and HCFA specific to the claiming unit and any amendments denoting any changes to the claiming plan and/or activities performed by the unit must be retained by the LEC. Refer to MAA Claiming Plan requirements under Section 5 of this manual.

Position Descriptions/ Duty Statements

Position description and/or duty statement for each classification of individuals performing MAA activities must be retained. The position descriptions and/or duty statement must contain language showing that the position descriptions and duties match the activities in the MAA Claiming Plan.

Medi-Cal Percentages

Documentation of the methodology, calculations, and supporting data used to determine the percentage of Medi-Cal clients to be used in the quarterly MAA claim must be retained in the audit file by the LEC. The Medi-Cal percentage calculation and documentation must be updated each quarter. Please reference Section 6, Determining the Medi-Cal percentage, of this manual.

Contracts/ Memorandums of Understanding

Copies of all signed contracts, MOU's or lateral agreements including exhibits with the LEC et.al., for the MAA period of the claim must be retained. These contracts must include the MAA contract with DHS.

Claim Documents

A copy of each claim, by quarter, including worksheets and calculations used in the development of the MAA claim must be retained in the audit file for each fiscal year. Also included must be the supporting documentation for all costs and revenue included in the MAA claim.

Narrative descriptions of the calculations and supporting documentation for any costs included in the MAA claim must also be retained in the audit file.

MEDI-CAL ADMINISTRATION ACTIVITIES DOCUMENTATION

SPMP Questionnaire

Copies of the SPMP questionnaire indicating allowable qualifications must be retained for staff for whom reimbursement at the enhanced rate will be claimed.

AUDIT FILE CHECKLIST

The following list is provided as a guide to determine what to include in the audit file when claiming for Medi-Cal Administrative Activities (MAA). The list is general in nature and is not intended to be all inclusive.

Time Survey Materials

- Original time survey logs to be signed by the employee and the employee's supervisor.
- Copies of time cards for the time study period of all staff participating in the time survey.
- Copies of the computations which calculated the allowable administrative time.

MAA Claiming Plan and Amendments

- The approved Claiming Plan specific to claiming units and any approved amendments denoting any changes to the claiming plan and/or activities performed by the claiming unit.
- All supporting documentation for the Claiming Plan including flyers, brochures, agendas, attendance logs or training logs of individual staff, contracts, resource directories. Refer to Section 5 of this manual for Documents required for each MAA.

Position Descriptions/

Duty Statements

- Duty statements and/or position descriptions for staff performing MAA.
- Copies of the survey used to determine if staff qualify as Skilled Professional Medical Personnel (SPMP).
- Organization chart showing the relationship of SPMP clerical staff to SPMPs.

Claim Documents

- Worksheets, spreadsheets and methodology used in developing the claim.
- Copies of methodology for calculating agency indirect cost rate.
- Documentation to support the Medi-Cal percentage claimed.

Contracts

- The contract between the Department of Health Services and the Local Educational Consortium (LEC).
- Contracts or sub-contracts between any LEC/LEA participating in MAA and their contract agencies.
- Time surveys (as above) if contractors are time surveying; written description of methodology used to calculate costs if time surveys are not used.
- The contract with the Host Entity.